

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division

IN RE: ANDERSON LEE
BEVERLY ELIZ LEE,

CASE NO: 11-70176

Debtors.

NOTICE OF MOTION

Anderson Lee and Beverly Eliz Lee, have filed papers with the court to suspend their Chapter 13 Plan Payments.

Your rights may be affected. You should read these papers carefully and discuss them with your Attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with one.)

If you do not want the court to grant the relief sought in the motion, then on or before **May 24, 2011**, you or your attorney must: File with the court, at the address below, a written request for hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date stated above.

Clerk of Court
United States Bankruptcy Court
Eastern District of Virginia
Norfolk Division
600 Granby Street
Norfolk, VA 23510

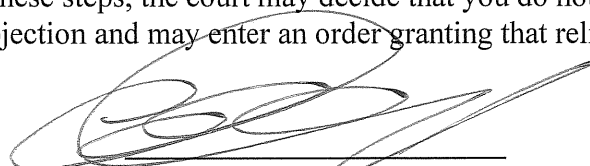
You must also mail a copy to:

Hampton Roads Legal Services
2624 Southern Blvd. Suite 101
Virginia Beach, Va 23452

and Anderson and Beverly Lee
957 Railroad Avenue
Chesapeake, VA 23324

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: May 3, 2011



Edrie A. Pfeiffer 41791
VSB Number
Counsel for the Debtors

CERTIFICATE OF MAILING/SERVICE

I hereby certify that on May 3, 2011, a true copy of the foregoing Notice of Motion was mailed to or electronically served via electronic case filing to all creditors and parties in interest at their respective addresses listed on the attached Service List.

A handwritten signature in black ink, appearing to read 'Edrie A. Pfeiffer', is written over a horizontal line.

Edrie A. Pfeiffer 41791

Edrie A. Pfeiffer 41791
2624 Southern Blvd. Suite 101
Virginia Beach, VA 23452
(757)340-3100
VSB Number
Counsel for the Debtor

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

IN RE: ANDERSON LEE
BEVERLY ELIZ LEE,

Debtors.

CASE NO: 11-70176
CHAPTER 13

MOTION TO SUSPEND CHAPTER 13 PLAN PAYMENTS

The Debtors, Anderson Lee and Beverly Eliz Lee by counsel, hereby move to suspend their Chapter 13 Plan payments for the month of May, 2011, plus \$1,430.00 arrear, and to resume in June 2011, for a total of one month, with the suspended payment and arrear cured by the 55th month of the Plan, and in support thereof say as follows:

1. That the Debtors filed a Chapter 13 bankruptcy petition with this Court on January 15, 2011, and filed a Chapter 13 Plan on or about February 11, 2011.
2. Monthly payments in the amount of \$715.00 have been made in a timely manner on the Chapter 13 Plan.
3. That Debtors will be unable to make the Chapter 13 payments due to a loss of income for the wife.
4. That the Debtors would like to suspend payments until May 2011 to allow them to re-establish their financial position.
5. Debtors will be able to resume making payments in June 2011 because the husband will have taken on a part-time job.

WHEREFORE, the Debtors move this honorable court, pursuant to Bankruptcy Rule 9014, to enter an Order suspending debtor's Chapter 13 Plan payments for the month of May, 2011, plus \$1,430.00 arrear, and to resume in June 2011, for a total of one month, with the

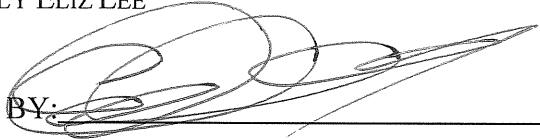
Edrie A. Pfeiffer 41791
2624 Southern Blvd. Suite 101
Virginia Beach, VA 23452
(757)340-3100
VSB Number
Counsel for the Debtor

suspended payment and arrears cured by the 55th month of the Plan,

Dated in Virginia Beach, Virginia, this May 3, 2011.

ANDERSON LEE

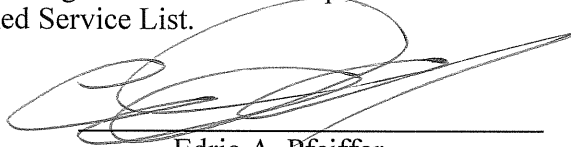
BEVERLY ELIZ LEE

BY: 

COUNSEL FOR DEBTORS

CERTIFICATE OF MAILING

I hereby certify that on May 3, 2011, a true copy of the foregoing Motion was mailed to or electronically served via electronic case filing to all creditors and parties in interest at their respective addresses listed on the attached Service List.



Edrie A. Pfeiffer
Counsel for Debtors

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Counsel for the Debtor

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Anderson Lee
Beverly Eliz Lee
957 Railroad Avenue
Chesapeake, VA 23324
Federal Housing Regulatory
200 Granby Street
Norfolk, VA 23510
Equifax Credit
Information Services, Inc
P.O. Box 740241
Atlanta, GA 30374

TransUnion Consumer Solutions
PO Box 2000
Crum Lynne, PA 19022
ChexSystems
Attn: Consumer Relations
7805 Hudson Rd., Ste. 100
Saint Paul, MN 55125
TeleCheck Services, Inc.
5251 Westheimer
Houston, TE 77056

Recovery Management Systems Corp
25 SE 2nd Avenue, Ste 1120
Miami, FL 33131-1605
NCO Financial Systems, Inc.
507 Prudential Road
Horsham, PA 19044
Internal Revenue Service
400 N 8th Street Box 76
Richmond, VA 23219

Virginia Dept of Taxation
Office of Customer Services
Post Office Box 1115
Richmond, VA 23218-1115
Experian
701 Experian Parkway
Allen, TX 75013
Commonwealth Asset Services LLC
Pembroke One Bldg, 5th Flr
281 Independence Blvd
Virginia Beach, VA 23462

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Santander Consumer Usa
8585 N Stemmons Fwy Ste 1100-N
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Sykes, Bourdon, Ahern & Levy,
Pembroke One Building
5th Floor
281 Independence Blvd.
Virginia Beach, VA 23462

Treasurer, City of Chesapeake
PO Box 16495
Chesapeake, VA 23328
Verizon
Po Box 3397
Bloomington, IL 61702